

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 LAURA MYERS, IL Bar #6338417
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
JAMAIYAH D. LYLES
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JAMAIYAH D. LYLES,

15 Defendant.
16

Case No. 5:22-po-00184-CDB

MOTION FOR ORDER AUTHORIZING
VIDEO APPEARANCE; [PROPOSED] ORDER

Date: February 6, 2024

Time: 10:00 a.m.

Judge: Hon. Christopher D. Baker

17 Defendant Jamaiah D. Lyles hereby moves this Court for an order authorizing her to
18 appear via video at the federal court in Houston for the February 6, 2024 change of plea hearing.

19 On June 26, 2022, Ms. Lyles received two citations—one for driving without a license in
20 violation of 18 U.S.C. § 13 (incorporating California Vehicle Code 12500(a)) and one for
21 speeding in violation of 18 U.S.C. § 13 (incorporating California Vehicle Code 22349(b)).

22 On October 3, 2023, this Court granted Ms. Lyles's request to plead guilty at the federal
23 court in Houston. The change-of-plea hearing was initially set for November 7, 2023, but was
24 later continued to December 5, 2023. Ms. Lyles did not appear for the change-of-plea hearing on
25 December 5, 2023. Counsel contacted the court on her behalf to place her back on the calendar,
26 and her next appearance is scheduled for February 6, 2024.

27 Ms. Lyles apologizes to the Court for her failure to appear. The prior week, she had
28 traveled to El Paso with her infant daughter, with the intention to return to her home near

1 Houston before the hearing. Unfortunately, while in El Paso, Ms. Lyles's daughter became ill,
2 with a cough that kept her from sleeping. Ms. Lyles decided to delay her return trip, rather than
3 take her daughter on public transportation while she was sick. In her concern for her daughter's
4 health, the court date slipped her mind. She regrets this mistake.

5 The defense now moves this Court for an order authorizing Ms. Lyles to appear via video
6 at the February 6, 2024 hearing. Ms. Lyles currently lives in Humble, Texas—approximately
7 1,675.8 miles from Bakersfield, California. Ms. Lyles, a single mother, does not have the
8 financial means to travel to Bakersfield.

9 If this Court does not grant Ms. Lyles's motion to appear via video, Ms. Lyles requests a
10 one-month continuance, to March 5, 2024, to allow time for counsel to move for financial
11 assistance for her travel.

12
13 Respectfully submitted,

14 HEATHER E. WILLIAMS
15 Federal Defender

16 Date: January 16, 2024

/s/ Laura Myers

17 LAURA MYERS
18 Assistant Federal Defender
19 Attorney for Defendant
JAMAIYAH D. LYLES

20 **ORDER**

21 **IT IS SO ORDERED.** Defendant Jamaiyah D. Lyles is authorized to appear via video
22 from the federal court in Houston for the February 6, 2024 hearing.

23 IT IS SO ORDERED.

24 Dated: **January 16, 2024**

25 
26 UNITED STATES MAGISTRATE JUDGE
27
28